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7 *Attorneys for Defendants*  
 8 *Bank of America Corporation, Bank of*  
*America, National Association, itself and as*  
*successor by merger to BAC Home Loans*  
*Servicing, LP, and ReconTrust Company,*  
*N.A.*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 JACK THACKER and LISA THACKER,

13 Plaintiffs,

14 vs.

15 BANK OF AMERICA CORP, BANK OF  
 16 AMERICA, NATIONAL ASSOCIATION, BAC  
 17 HOME LOANS SERVICING LP,  
 RECONTRUST COMPANY N.A.,

18 Defendants.

Case No.: 3:11-cv-00113-RCJ-WGC

19 **PROPOSED STIPULATION AND ORDER**  
**FOR EXTENSION OF TIME TO**  
**SUBSTITUTE CARRINGTON**  
**MORTGAGE HOLDINGS, LLC**

20 Plaintiffs Jack and Lisa Thacker, through their counsel of record, Steve Evenson, Esq. of  
 21 Evenson Law Office, and Bank of America Corporation, Bank of America, National Association,  
 22 itself and as successor by merger to BAC Home Loans Servicing, LP, and ReconTrust Company,  
 23 N.A. (collectively **defendants**), through their counsel of record Ariel E. Stern, Esq. and Christine M.  
 24 Parvan, Esq. of the law firm of Akerman LLP hereby stipulate as follows:

25 1. On January 12, 2015, this Court issued an order denying both plaintiffs' motion to set aside  
 26 the subject settlement agreement and defendants' motion to enforce the settlement agreement;  
 27 2. The Court imposed a deadline of seven (7) days from entry of its order for plaintiffs to file a  
 28 motion to substitute Carrington Mortgage Holdings, LLC as a party to this action and request  
 this Court enforce the settlement agreement by having Carrington sign it; and

3. As Carrington has agreed to provide written confirmation to plaintiffs' counsel that it will implement the loan modification as contemplated under the settlement agreement if plaintiffs make the required lump-sum payment, the parties' respectfully request the Court grant plaintiffs' an additional ten (10) days to file the aforementioned motion to substitute Carrington in order to give the parties additional time to attempt to resolve this matter without further litigation.

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IT IS SO ORDERED this 21st day of January, 2015.

R. Jones  
DISTRICT JUDGE

Submitted by:

/s/ Christine M. Parvan  
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